

Comments from OCV Meetings

Efficacy of vaccine

- At only 65% efficacy, the vaccine is not that effective and will not protect our livestock
- Why not double up the vaccine to increase efficacy?
- The minimum age requirement for vaccination should not occur until the animal is old enough for the vaccine to have maximum effectiveness

Workload

- There is an acute shortage of large animal veterinarians to do the work and no funding available to compensate ranchers
- Statewide vaccination of retained females (including adults) makes more sense and would be more feasible than this proposal, particularly to keep the DSA boundaries from expanding
- Who determines whether animals need to be spayed, vaccinated, or F branded at the markets? Making that designation and then actually doing the work will significantly slow down the process
- Brand inspectors are going to have a greatly increased work load if they have to check each individual animal for a shield and tag
- The process to re-tattoo or re-tag an animal at the markets takes way too much time; there is no way the current system can be used during the sale and it's not feasible to run animals through the chute more than once
- Implementing this proposal will increase the workload for MDOL employees with all the necessary paperwork and enforcement burdens
- It will be a hassle to have to license a premise that can accept non-vaccinated animals, especially for small producers
- In northeastern Montana, only 25-30% of all heifers are currently vaccinated, and maybe 50% of the breeding animals, not the USDA's reported 70%. There is no way to increase that percentage with the current number of vets in the area.
- It would be a time consuming operation to schedule a vet and then have to handle the cattle several times to sort, weigh, run them through chutes to vaccinate, and load
- The F brand would just be another unnecessary rule that would require more unnecessary work and inconvenience for our ranchers

Wildlife concerns

- It would be more cost effective to concentrate on the counties where brucellosis is a problem, not on creating a statewide requirement

- The focus needs to be on the source of the possible infection, the wildlife, to decrease the transmission risk level
- Our government should get some stimulus money from the President to create some jobs to clean up the brucellosis problem in the wildlife
- This proposal takes things too far -- the only reason we have to worry about vaccinating is because there is brucellosis in the wildlife
- Montana ranchers have put a lot of time and money into managing our livestock herds, but FWP is not holding up their end of things with the wildlife, which exacerbates the problems for livestock
- The MDOL and State Veterinarian need to focus on the problem, not punish the stockgrowers, who have already cooperated with eradication efforts
- If all Montana calves need to be vaccinated, then the wildlife should also be vaccinated to reduce the risk to all concerned

Marketability

- This proposal will reduce the value of heifer calves: they will be more stressed and buyers won't be as interested
- Adult vaccinating won't necessarily improve marketability because there are a number of states that don't accept adult vaccinates
- This proposal will not increase marketability because the fate of an animal has to be decided by the seller prior to or at the time of sale. The producer's flexibility will be reduced; the buyer should have the responsibility of getting them vaccinated if they stay in Montana.
- There is no lack of buyer confidence in Montana cattle right now, but this proposal will take marketing options away from producers
- As a Class Free state, there is no problem with marketability to other states, but the media is making a fuss in regards to antibiotic use in cattle. All injections, regardless of whether they are vaccines or antibiotics, are viewed in the same negative light by the public.
- If consumers want beef with fewer vaccinations/shots, then it is not in our best interest to vaccinate all heifers, but heifers kept for breeding should by all means be vaccinated
- The F brand is not a good idea: it is a blatant statement to others that we have a problem in Montana

Identification

- Illegible tattoos and lost tags will be issues and will just increase costs to the producers
- What about illegible tattoos, missing tags, and animals without ears? The re-tattoo process is way too involved to be able to accomplish at the chute

- If there is no evidence that an animal has been vaccinated, just send it straight to slaughter and vaccination will more likely start happening
- The quality of tattoos is poor – vets are going to have to know how to apply tattoos more effectively
- A large number of ranchers already bangs vaccinate. The problem is the loss of evidence of vaccination: missing tags and illegible tattoos. Can we stipulate that any form of evidence is acceptable or does APHIS have to decide that?
- We will need a more permanent marking than a tattoo
- Mandatory vaccination could be advantageous, but there have to be better options for documentation and proof of vaccination
- There needs to be more of an emphasis on veterinarians getting the tagging and tattooing done right the first time because it costs the producers more to have to pay for it a second time around

Enforcement

- Who is authorized to apply the F brand?
- Determining whether heifers are spayed or not will be an issue, especially if they are spayed by producers
- Biggest issue with this proposal will be enforcement, especially at the markets
- There will be problems with inspections and enforcement in the country because brand inspectors will have to check each animal individually
- It is unclear who/what agency will enforce these regulations both in the country and at the markets

Financial burden

- How is the WY program working? Do vaccinated heifers actually bring more money at the markets?
- Mandatory OCV will increase expense and bureaucracy and solve nothing
- Implementing this proposal will create a great cost for producers: approved feedlots will need to have personnel to manage paperwork; the figures will never add up to creating more marketability and getting better prices.
- There is no monetary benefit in vaccinating younger animals, the increase in value may only come as they approach 12 mo of age
- Anytime the government adds more regulations, it adds costs to the producers, and this is a break-even business at best as it is

- It is an economic detriment to producers when shields can't be read any longer – either in having to pay to get it done again, or in the difference in prices for cattle with legible vs illegible shields
- FWP should be responsible for some of the costs if this proposal is implemented, otherwise the costs always come back to the producer
- Implementing and enforcing these regulations will be expensive. Don't look to the producers and veterinarians to pay for it because they have already eliminated brucellosis from the cattle population
- The cost of official calfhood vaccination is a small price to pay to maintain Brucellosis Free Status which helps with interstate movement and marketability of our livestock

Too many regulations

- This proposal creates more stringent requirements than the other two states with DSAs by adding a testing requirement
- This is just a way to increase the number of regulations placed on producers
- The biggest damage to the livestock industry is not the disease itself, but the regulations in place to control it; it is a good thing that the USDA is working on changing the rules
- We have had brucellosis issues before, but never a mandatory vaccination requirement, and just because the two other states bordering Yellowstone National Park have a requirement doesn't mean we need to as well
- Implementing more regulations just means more loss of freedom for ranchers
- If vaccination stays voluntary, producers will be happy to do it, but if it becomes mandatory, it will be met with a lot of resistance

Issues with the current proposal

- It doesn't make sense to impose an export requirement on Montana animals, especially when there are no other states that have export requirements; it is easier to call numerous states to get their specific requirements than to just vaccinate everything
- What happens at a bred cow sale when mixing vaccinated and non-vaccinated animals at check-in, and sorting is prohibitive after the sale has begun?
- Some animals may be spayed after they are 12 mo of age. Under this proposal, they would have to be vaccinated before that time even if they will eventually be spayed.
- It shouldn't be the seller's responsibility to vaccinate at the time of weaning or sale since it is the buyer who ultimately decides the animal's use
- The line between which animals are breeders or feeders is blurry: it is in the eye of the beholder

- If a premises such as a heifer development facility becomes an approved feedlot, it will reduce their options, and possibly put them out of business, because they won't be able to keep vaccinated and non-vaccinated animals in proximity to each other
- A producer's flexibility will significantly decrease if a decision has to be made right away whether an animal will be destined for feeding or breeding
- Vaccinating prior to country sales and video sales is feasible because the seller knows where the animals are going. At markets, the seller doesn't know where the animal is going and it would be a waste of money to have to vaccinate animals prior to sale if they don't need to be.
- What happens with the adult females that are already in Montana but not vaccinated?

Increases stress on animals

- Running every animal through the chute at the markets to vaccinate them increases their stress levels. It is detrimental to their well being, and therefore prices to do so if it is not necessary, and unless they will be used for breeding in Montana, it's not necessary.
- The farther you get from the GYA, the less the market and state vets care whether they are vaccinated or not. There would be a decrease in the value of vaccinated animals because they are more stressed; it is the quality of the animal that is more important, not whether it is vaccinated or not
- Cortisol levels from stress are a major factor in immune failure; handling animals unnecessarily in the heat is not only abusive, but it will also lead to more antibiotic use later in their lives
- To expect calves to be vaccinated the day of delivery, in addition to the weaning stress and transportation stress, is unimaginable

Suggestions

- It would be advantageous to have Stockgrowers, Farm Bureau, and extension on board with this proposal to increase producer awareness and acceptance
- Can we just implement Best Management Practice policies?
- Is it possible to use an age-driven system (still at change of ownership, though) rather than having to vaccinate young heifers at the first change of ownership?
- The quarantine for vaccinating at destination should be extended: rather than within 30 days of arrival, it should just be before the animals are 12 mo because they may be spayed after the 30 day window
- We should be focusing more on Best Management Practices within the higher risk areas
- The rule should be changed to start the requirement at 8 mo rather than 4 mo
- The proposal as it is written says nothing about spaying animals
- Accredited vets and/or market vets should be able to look up bangs tag numbers

- The Board of Livestock should run a state-wide survey of producers to ask about the vaccination status of their herds
- All breeding heifers and all bison should be vaccinated
- Females going into the feeder channels should be spayed; sexually intact females should be vaccinated
- An awareness campaign or some assistance in contracting veterinarians into areas with limited service might allow for a higher compliance rate
- Producers may be more open to a rule mandating vaccination between the ages of 12-15 mo
- Since the Montana seedstock industry is so big, we should just mandate that all females either be vaccinated or spayed
- If animals aren't vaccinated as calves, they should automatically become slaughter animals
- Vaccination should be encouraged or required when cattle may come into contact with infected wildlife